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January 22, 2014

By ECF

The Honorable Faith S. Hochberg
United States District Judge
United States District Court for the District of New Jersey
50 Walnut Street
Newark, NJ 07101

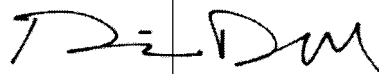> **Re: U.S. v. Wolfson, et al., No. 2:13-cr-748 (FSH) (D. NJ)**

Dear Judge Hochberg,

I represent defendant Gregg Gehring in the above-referenced case. Please accept this letter application in support of our motion for a sealing order for a previously-filed exhibit.

We filed a reply on behalf of Mr. Gehring on January 21, 2014, (ECF No. 28), related to the government's motion for a Speedy Trial Order. Our reply contained an exhibit entitled Exhibit 1 (ECF No. 28-1). Exhibit 1 is a spreadsheet of items the government intends to produce to the defendants in discovery, which we received on December 18, 2013. The spreadsheet was not marked as confidential. However, to be sure, when we filed our motion, we emailed the prosecutors to see if they wanted Exhibit 1 filed under seal; the prosecutors responded that they would like Exhibit 1 filed under seal because, they said, it reveals grand jury information which has been provided to the defendants pursuant to the Court's discovery order dated January 6, 2014.

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        We emailed the Court this morning, January 22, 2014, to request that the
Court temporarily remove Exhibit 1 from ECF until the Court resolves the present
motion. In light of the foregoing, we respectfully ask for an order from the Court
sealing Exhibit 1 (ECF No. 28-1), thereby restricting public access to Exhibit 1.

                                        Respectfully,

                                        Robin L. Dull

cc: Michael F. Myers (by ECF)
        Robert Joseph Olejar (by ECF)
        Kevin F. Carlucci (by ECF)
        Charles V. Reilly (by ECF)
        John W. Van Lonkhuyzen (by ECF)

SO ORDERED.

_____   1/27/2014
THE HONORABLE FAITH S. HOCHBERG
United States District Judge
United States District Court for the District of New Jersey